

July 24, 2017

To whom it may concern:

Fire2Wire respectfully submits the following comments with regards to the petitions filed by the CTIA and T-Mobile and proposed changes to the CBRS band.

Fire2Wire is a Wireless Internet Service Provider (WISP) covering the greater San Joaquin Valley of Central California currently serving thousands of rural business and residential users. Since 2000, Fire2Wire has relied primarily on unlicensed spectrum regulated under Part 15. Though business has thrived under this model, it is not without its challenges, risks, and limitations.

An example of one of these challenges is the California Advanced Services Fund (CASF). CASF was established to provide public funds to assist with the deployment of broadband in under-served and unserved areas, and is now working under a directive to ensure 98% of all households in California have access to broadband Internet service. However, in a recent CASF workshop, coverage provided by Fixed Wireless providers was discounted and removed from coverage maps. The reasoning provided was that Fixed Wireless, as a technology, cannot guarantee that it can provide 100% coverage within a given census block.

The CBRS band, with its additional 100MHz of spectrum, and innovative use of the SAS, combined with affordable LTE equipment currently in use in the nearby 3.65GHz band, is expected to be the way to bridge this gap in coverage and perception of Fixed Wireless. With access to the CBRS band under the existing rules, Fire2Wire, as well as other WISPs, would be able to better serve their existing coverage areas helping to meet the mandate to 98% households served without the need for costly FTTx projects.

Also, Fire2Wire hopes that the success of the SAS in conjunction with the CBRS band will lead to additional spectrum being re-purposed under this model, allowing for more flexible and efficient use spectrum, the of the lifeblood of our increasingly connected and mobile world.

In conclusion, Fire2Wire asks that you do not adopt the changes proposed by the CTIA and T-Mobile, and allow the CBRS band to continue as vehicle for innovation and entrepreneurship, as it was intended.

Sincerely,



Kristian Hoffmann, President  
Fire2Wire